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December 25, 2020

VIA ELECTRONIC FILING (ECF)

Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Centre Street
New York, NY 10007

Re: ***Wang v. Verizon Communications Inc., et al.***
U.S. District Court, S.D.N.Y., Case No. 1:19-cv-09506-JMF-RWL
Letter Motion to Extend Defendants' Time to Respond to Second
Amended Complaint on Consent

Dear Judge Furman:

This letter motion ("Motion") is respectfully submitted pursuant to Rule 1(C) of the Court's Individual Rules and Practices in Civil *Pro Se* Cases. Plaintiff, Hao Zhe Wang ("Plaintiff") filed a Second Amended Complaint ("SAC") on December 21, 2020 (ECF 136).

By this Motion, Defendants¹ respectfully request an enlargement of time within which to file a responsive pleading to the SAC, from January 4, 2021 through and until January 29, 2021. Plaintiff has graciously consented to Defendants' request herein, and Defendants have made no previous requests for extension of time to respond to the SAC. The additional time is needed to evaluate the Statement of Claim in the SAC, which has been substantially expanded from 6 pages (12 paragraphs), to 28 pages (56 paragraphs), and to meet and confer with Plaintiff before engaging in any motion practice.

¹ "Defendants" includes (1) Verizon New England Inc., (2) Verizon Communications Inc., (3) Verizon Wireless (VAW) LLC, (4) Verizon Business Network Services Inc., (5) Verizon Corporate Resources Group LLC, and (6) Verizon Sourcing LLC.

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This request for relief is made in good faith, and not made for any improper purpose.

We thank the Court for its time and consideration in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'HAF', with a large, stylized flourish extending from the end.

Howard A. Fried (HAF2114)

MCGIVNEY KLUGER CLARK &
INTOCCIA, P.C.

Attorneys for Defendants

hfried@mkcilaw.us.com

cc:

Via ECF

Hao Zhe Wang, Plaintiff, *Pro Se*

SO ORDERED.

Dated:

Hon. Jesse M. Furman
United States District Judge